



Department
of Energy &
Climate Change

Government response to Consultation

Review of the Siting Process for a Geological Disposal Facility

July 2014

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Introduction

1. During 2013, the Department of Energy and Climate Change (DECC) conducted a public consultation on the review of the siting process for a geological disposal facility (GDF). The full consultation document can be read online¹. The purpose of the consultation was to gather views on how aspects of the siting process for a GDF could be revised and improved, whilst retaining the preference for a process based on engagement with willing communities.
2. The proposals in the consultation were developed by considering experience from the previous process (as set out in the 2008 Managing Radioactive Waste Safely White Paper²), further national stakeholder engagement and a public call for evidence in early 2013.
3. The consultation document posed a series of questions about the Government's proposals, which covered the following areas:
 - **Decision making and roles** in the siting process, including a proposal for there to be a direct test of public support before proceeding with construction of a GDF;
 - **Technical delivery of the GDF**, including information about geology, the inventory of waste for disposal and land-use planning issues;
 - Involvement of **Communities**, including representation, benefits and socio-economic impacts and assessments.
4. The consultation was launched on 12 September 2013 and closed formally on 5 December 2013³.
5. The consultation was published online. Members of the public were able to respond through an online response tool provided, by email and by post. DECC held a web chat to answer questions about the consultation proposals, and held a number of consultation engagement events across the country.

Consultation events

To support its consultation, DECC conducted 15 engagement events during November and December 2013, at locations across England and Wales. These

¹ <http://bit.ly/1ihUggo>

² <http://bit.ly/13LFztn>

³ Because of a technical issue with one of the email addresses listed in the consultation document, responses submitted by email (as distinct from those submitted by post or through the online form) were also accepted up to 19 December 2013.

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events included deliberative workshops with a representative spread of members of the public.

All the events were designed to help attendees explore and understand the implications of the consultation proposals, to help the Government obtain feedback on these, and to support participants in developing their own responses to the consultation. In addition, the public events aimed to help the Government gain an understanding of the general public's awareness of geological disposal.

Whilst the feedback received during the events complemented the consultation, they were not taken as formal responses to the consultation. DECC encouraged all attendees to submit formal responses in addition.

You can read reports from all events online⁴.

Government has considered and reflected key themes raised at the events as it developed this revised White Paper. Some of the recurring themes were: the importance of providing more information at an early stage to communities; the inherent difficulty in deciding who represents a community but the need to be more certain about it; and a need to be clear about community investment and how it will be defined and administered.

6. There were 719 responses to the consultation in total, 301 of which were part of a letter writing campaign. All the responses to the consultation have been made available to read online⁵.
7. These responses were broken down into 12 categories of respondent: Academia and Learned Societies; Individuals and Society; International Governments and Crown Dependencies; International Organisations (include Waste Management organisations); Local Government; Local NGOs (Non-Governmental Organisations); National NGOs (Non-Governmental Organisations); Not Stated; MPs, Councillors and Political Parties; Regulators, the Committee on Radioactive Waste Management (CoRWM) and other public sector organisations; Trade Unions; and UK Business. The numbers of responses in each of the categories is set out in the table below.

Respondent Category	Number of Responses	Percentage of total
Academia and Learned Societies	11	3%
Individuals and Society	530	74%
International Governments and Crown Dependencies	2	<1%
International Organisations	1	<1%
Local Government	94	13%

⁴ <http://bit.ly/1fCtrlQ>

⁵ <http://bit.ly/1fCtrlQ>

Local NGOs (Non-Governmental Organisations)	22	3%
National NGOs (Non-Governmental Organisations)	7	1%
Not Stated	3	<1%
MPs, Councillors and Political Parties	12	2%
Regulators, CoRWM and other public sector organisations	7	<1%
Trade Unions	2	<1%
Business	28	4%
Total	719	100%

Responses to consultation by category – totals may not sum due to rounding methods used

8. What follows is a high level summary of these consultation responses and the UK Government's response to these, organised under each question of the consultation.
9. In reporting the overall response to each question, 'majority' indicates the clear view of more than 50% of respondents in response to that question, and 'minority' indicates less than 50%. 'About half' indicates an overall response within a few percentage points of 50% (either way).
10. The following terms have been used in summarising additional points raised in the responses: 'many' respondents indicates more than 70% of those answering the particular question, 'a few respondents' means fewer than 30%, and 'some respondents' refers to the range in between 30% and 70%.
11. In the Government response sections, 'we' refers to the UK Government.

Question 1: Do you agree that a test of public support should be taken before the representative authority loses the Right of Withdrawal? If so, what do you think would be the most appropriate means of testing public support, and when should it take place? If you do not agree with the need for such a test, please explain why.

Summary of responses to question 1

12. The majority of respondents to this question agreed or partly agreed that there should be a test of public support before a potential host community gave up its right of withdrawal from the siting process for a GDF, although opinions were mixed on how it should be carried out. The main reasons given by those who agreed with the proposition were that this would ensure that the siting process was democratic and that it would support decision making by local authorities.
13. Some respondents suggested that there should be a test of public support early in the siting process, to provide transparent backing for the siting process to proceed in that

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area. This early test was proposed instead of (or, more commonly, as well as) a later, final test of support to host a GDF. Other respondents proposed a range of potential timings for a test of public support during the siting process.

14. Of those commenting on the specific means of testing public support, many expressed the view that this should be through a referendum – although a number of these responses also recognised the potential risk of bias in the event of low turnout for a referendum. A few suggested that opinion polls or surveys would be more appropriate, as these would be less prone to the impacts of low turnout. The remainder of respondents who commented on the means of testing public support proposed consultative or deliberative events as means of identifying community views, given the complex range of issues involved in implementing geological disposal.
15. With regard to geographical extent, a few respondents to this question proposed that public support should be tested over a county or larger area, in order to take account of the wider impacts of hosting a GDF. A few respondents took an alternative position, proposing that support should be tested at the parish or district level, for the reason that the community closest to the chosen site would be the most directly affected by it. A few respondents argued that support should be tested at multiple levels, to take account of both of these factors. A few respondents commented that the scope of any test of public support should be driven by potential impacts and benefits, rather than existing administrative or political boundaries.
16. While a few respondents felt that the process for determining public support needed to be defined early in a revised siting process, others felt that this would be premature given the timescales of the siting process and / or the need to allow local communities themselves to decide or influence this process.

Government response

17. We agree with the majority view that a test of public support should be required before a potential host community commits to hosting a GDF and before development of a GDF can proceed. This is fundamental to ensuring that the decision to proceed in an area is genuinely endorsed by the community, without requiring them to justify that decision on the basis of any specified criteria. It is a unique approach, potentially setting decision making on a GDF apart from other forms of infrastructure development by raising the bar for the level of local endorsement required before it goes ahead. We have therefore committed in the new White Paper to the principle that development of a GDF will not proceed without a positive test of public support. However, it should be noted that even where there is community support to a GDF in principle, its development and operation can only proceed once all planning and regulatory approvals (including on the safety and environmental impacts of the development) have been given. Therefore any public test of support in that area would concern the community's view on development in that area – but it would not, in and of itself, guarantee that the development could or would proceed.
18. Consultation responses considered a range of potential mechanisms for how a test of public support could be taken, each of which has potential advantages and disadvantages. For example, while referendums are an established means of producing a 'clear cut' result, they also carry with them the potential risk of bias in the event of low turnout. Opinion polls or surveys have the potential to be more representative and less prone to bias, but there is less experience of using them in local decision making. Consultative or deliberative events would be a more interactive means of addressing the complex issues and questions raised by a GDF development, but the practical details of such an approach would need much further work and agreement if they were to credibly support a local process of community representation. A similarly broad range of opinions

was given as to the geographical extent of a test of public support, particularly in view of the different kinds of community that might engage with the process.

19. A number of respondents took the view that it would be premature to define now how the process for determining public support would operate in the future, particularly as this would not be put into practice for some time. It is vital that the final approach is credible, open and representative, and that it is able to reflect up-to-date best practice in local opinion-testing. There was no clear consensus amongst respondents to the consultation about what the process should entail or how to undertake it. Taking all these points together, and considering the fact that the formal process of working with communities (as set out in the new White Paper) will not begin until around 2016, we do not consider that it is either practical or desirable to specify at this stage how the test of public support will be carried out. Therefore the new White Paper provides for a community representation working group to be established, consisting of experts on community decision making, who will spend more time considering this issue. The group will also consider other issues linked to community representation and support. This process is intended to enable the process for community representation to be clearly defined by 2016.
20. The same requirement for further discussion applies to the question of precisely when the test of public support should be taken. We note that a number of respondents felt that a test of public support should come early in a new siting process. However, we consider that this approach would risk the question being asked at a time when people are uninformed or uncertain about geological disposal and / or about what the actual impacts would be for their area. There might be insufficient information available about the specific site location, design and implications, and by committing to a test of public support early in a new siting process, a community could find that it had committed to a proposition that subsequently changed.

Question 2: Do you agree with the proposed amendments to decision making within the MRWS siting process? If not, how would you modify the proposed phased approach, or, alternatively, what different approach would you propose? Please explain your reasoning.

Summary of responses to question 2

21. There were mixed views on whether a 'continuous' siting process was preferable to one that had pre-determined stages and milestones. It was noted that a continuous process would ensure a focus on bringing relevant information to affected communities, and that a 'learning phase' early on would be helpful in front-loading the provision of that information. Conversely, a few respondents thought that without defined decision making points, the siting process could not move forward without an appropriate level of community support. A few stated that the process needed to make clear what the phases were and where the decision points were, in order to ensure that the community understands where the process has got to, and how that compares with any other communities that have entered the process. A few specifically supported the proposal for an ongoing right of withdrawal from the process in that community, to ensure that communities engaged in the process would not feel any pressure to continue if they no longer wished to.
22. Many respondents commented on roles in the siting process, rather than on the process itself. Responses made on these issues under question 2 are reflected within the question 3 summary.

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23. A few respondents noted the importance of national awareness raising as part of the decision making process, supporting the proposal for a national awareness raising campaign, and pressing for a stronger emphasis on wider public and stakeholder engagement within the siting process. A few argued that any engagement campaign needed to take place over a longer period of time and include as much relevant information as possible (for example, including impacts on transport and health). Some respondents suggested that, as part of this process, Government should outline and communicate 'suitability criteria' (including geology), with some suggesting that this information had primacy – that is, that it should be provided before any information about socio-economic benefits or investment was provided (or, as discussed under Question 3, before any communities formally enter the siting process).

Government response

24. We recognise the need for an enduring right of withdrawal, and are of the view that this does not require a series of predetermined milestones that, in practice, could prevent the developer and others from responding to community questions or concerns at the point they are raised. The right of communities to withdraw from the siting process – to stop having formal discussions with the developer – is a right that will continue to be a key characteristic of the revised siting process. However, it is our view that this is most effectively safeguarded through requiring a positive outcome from a test of public support before any final decisions on hosting a facility in that community are taken.
25. As set out in the consultation document, the decision points created in the previous siting process were in practice inadvertently artificial barriers to providing communities with information, weakening the decision making process in the long run. West Cumbria participated the farthest through that previous process. However, the rigidity of the process created a situation in which there was demand for further information about geology, but the necessary further work on local geology by the developer could not be carried out until a local decision was taken to proceed to the next stage. We are of the view that an appropriate process of community engagement would enable the developer of a GDF to consider in any order the questions that the community wishes to have answered, and that the developer should not be prevented from doing so because of artificial demands for communities to continually re-commit before work can be undertaken and concerns addressed.
26. Our view is that a process without artificial barriers will support, and indeed help foster, more effective community engagement as discussions about a GDF proceed, with access to the necessary information to support them through the process to an eventual informed decision on agreement or withdrawal.
27. The new White Paper will therefore specify the need to undertake a test of public support in a community, and for that outcome to be a positive one, before a GDF development can go ahead in that community (see Government response under Question 1).
28. We agree that greater clarity as to how the siting process will operate will also help to ensure that communities engaging in the process do not come under undue pressure to reach firm conclusions or make commitments prematurely. This has informed the approach to the new siting process set out in the new White Paper, both in terms of the early actions that Government and the developer will undertake in relation to the approach to national land-use planning in England and in carrying out a national geological screening exercise (respectively). The time taken to undertake these actions will be used to consider the question of appropriate community representation in more detail.

29. As is set out above (paragraph 19), we have decided to take the further time available to ensure that the process for community representation is appropriate. Further consideration will be informed by a community representation working group. Other than as set out below, we have formed no final view at this stage on matters raised by respondents on, for example, which tier or tiers of local government could and should act as community representatives, or on other matters relating to what constitutes local representation. We will await the findings of the working group.
30. However, having considered the responses to the consultation, we are of the initial view that it is unlikely that any one tier of local government can or should act as the sole representative authority in a siting process that must be applicable across the range of local government structures that exist nationally. We have set out in the new White Paper our view that all tiers of local government should have a voice in the process of community representation but that no one tier of local government should be able to prevent the participation of others in that community. This issue is discussed further in the Government response to Question 3.

Question 3: Do you agree with this approach to revising roles in the siting process set out in the White Paper? If not, what alternative approach would you propose and why?

Summary of responses to question 3

31. The majority of respondents to this question disagreed with the consultation's proposed approach to revising roles in the siting process. A few respondents argued that, rather than designating one tier of local government as the 'representative authority', all affected tiers of local government should be involved in the local decision making process. Respondents expressed specific concern about the role proposed for district councils in England, with a few arguing that, because a GDF could span district council boundaries, this tier of local government should not have sole responsibility for exercising the right of withdrawal. Related to this, a few respondents underlined the importance of county councils' role in decision making, noting their specific responsibilities in relation to several relevant issues (including as a waste planning authority).
32. A few respondents expressed support for the proposal that Government should take a more proactive role in raising awareness around geological disposal, while stating that information must be presented in an objective way. Opinions were mixed on whether Government should itself have a role in decision making, with a few respondents questioning the proposed roles for Government and the Nuclear Decommissioning Authority on a local Steering Group, arguing that this could present a conflict of interest.
33. There was support from a few respondents for the proposal that regulators should take a more proactive role in explaining their responsibilities. There was also general support for a body that could independently verify and peer review technical statements, with many respondents that specified a particular body calling for the role of CoRWM to be expanded to accommodate this function.
34. A few respondents to this question stated that a search based on geology should come before local communities got involved in the siting process. A few respondents felt that the term 'host community' in particular had to be defined before deciding how appropriate roles could be determined.
35. Opinions were divided on where responsibility for local decision making should lie. A few respondents agreed with the proposal that the district council should be the 'representative authority', citing subsidiarity and localism as the reasons, as stated in the

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consultation document. On the other hand, some respondents felt that county councils were best placed to represent the community and hold the right of withdrawal and / or felt that Parish Councils should have a role to play in the decision making process beyond that proposed in the consultation document. A few respondents felt that there should be a direct role for local residents in the decision making process.

36. A few respondents asked for clarity as to who would lead the local decision making process if a site extended beyond a single local authority's boundaries. Related to this, a few respondents argued that a combination of authorities would better represent the affected host community (or communities), making best use of authorities' current resources, responsibilities and local knowledge. Some respondents commented on the importance of local consultation as a part of the decision making process, to ensure a democratic process. A few respondents felt that decision making should be extended beyond the local, immediately affected area, as this was a matter of national interest.
37. A few respondents commented on the proposed membership of the 'Steering Group' and questioned the involvement of Government and / or the developer, citing a vested interest and a potential conflict of interest. The rationale behind this was that they would unduly influence the process given their interest in a GDF succeeding. A few argued that the 'representative authority', where this was a district council, should also not be on the Steering Group due to vested interest.
38. Some responses cited the importance of independence – whether in the recruitment of the chair of the Steering Group, the peer reviewing of technical reports, or the involvement of regulators to provide professional opinions to communities during the 'Learning Phase' – in ensuring trust and confidence in decisions that are made.

Government response

39. We have considered the responses carefully and taken note of the majority disagreement with the proposed role for district councils, as well as information and views presented about the importance of community involvement across and beyond different formal, local government structures. We recognise the variety of community types and local authority structures around the UK, and that designing a clear, uniform process of community representation that can be applied nationally is not a simple matter.
40. Taking that evidence into account, we consider that deeper consideration needs to be given to this issue. However we are of the view that it is unlikely that any one tier of local government can or should act as the sole representative authority in a siting process that must be applicable across the range of local government structures that exist nationally (see paragraph 30). We have set out in the new White Paper our view that all tiers of local government should have a voice in the process of community representation, and also that no one tier of local government should be able to prevent the participation of others in that community.
41. With this in mind, and in recognition of the fact that – under the revised proposals – no formal process of participation by communities is expected to begin before 2016, we intend to conduct a more comprehensive process to explore options for a new detailed framework of engagement, working with experts in the field of community decision making. The new White Paper sets out a plan for undertaking this work.
42. Responses to the consultation have also reinforced our view that a more proactive approach to raising awareness around geological disposal is needed. During the period before formal discussions with communities begin, the developer will undertake activities to explain the science and engineering of geological disposal and its programme, within the context of Government policy, to the general public. The aim of these activities will be

to share information and build a supportive environment for future, formal discussions with communities and, in the longer term, successful implementation of a GDF.

43. We note the concern raised by some respondents in relation to Government and / or the developer having a potential role in the process of community decision making. These concerns, along with other views and information, will be considered further as part of the work set out in the 'Working with Communities' chapter of the new White Paper (Chapter 7). However, it is clear that both Government and the developer will need to have a role in engaging with communities to provide information, answer questions and to be accountable for their proposed plans and activities. Ultimately, the developer and Government will also have to take decisions on expenditure and the final options for sites to be developed. However, these roles should run in parallel with the community's involvement.
44. We also recognise the important role that regulators have to play in any siting process – providing information, and the assurance that any GDF will be subject to robust, independent regulation. The new White Paper makes clear that regulators will make their requirements clear to the developer, and any communities considering hosting a GDF, at an early stage of the revised siting process.
45. We agree with the respondents that called for a means to independently review technical statements. The new White Paper makes clear our intention to implement a mechanism for communities, the developer, and Government itself, to openly access independent, third party views on particularly sensitive, complex or contentious issues during the GDF siting process. Whilst many respondents that identified a particular body to perform this role called for CoRWM's role to be expanded to fulfil this function, our view is that asking CoRWM to provide this service could impact on their core purpose of providing independent scrutiny and advice to the UK Governments on the long-term management of higher activity radioactive wastes. In addition, we consider it desirable to have access to a flexible pool of independent experts, rather than a committee of fixed membership, to ensure that expert views on particularly specialised issues that may arise over the course of the siting process. Full details of how this process will operate will be developed as part of ongoing discussions concerning the details of how Government and the developer will work with communities. As set out in the new White Paper, further development of this approach will be carried out in liaison with the learned societies, with a view to this mechanism being in place in 2016, when the process of working with communities will begin.
46. Calls for a search to be undertaken based on geology before local communities get involved in the process have informed the revised approach to national geological screening, which is discussed further in the Government response under Question 4.
47. Careful consideration has been given to whether and how it is possible to define 'community' at this stage. Clearly, it is difficult to set out a process for community involvement and for channelling any community investment without having defined these terms. However, consultation responses did not yield substantial evidence about how this could be done (beyond saying that a definition was needed and stating what the different components of a community might be), thus reinforcing the problem that the definition will always be dictated, to an extent, by the particular circumstances in question. What seems a reasonable definition in one area may not be equally applicable in another (see also the Government response on community benefits under question 7).
48. We have not reached a view at this stage about what constitutes a community for the purposes of the new White Paper. This issue will be given further consideration as an

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important part of the work on community representation to be taken forward following publication of the White Paper (and described in paragraph 19).

Question 4: Do you agree with this proposed approach to assessing geological suitability as part of the MRWS siting process? If not, what alternative approach would you propose and why?

Summary of responses to question 4

49. About half of the respondents to this question disagreed with the proposed approach to assessing geological suitability. Many of those who disagreed with the proposed approach called for a more prominent, proactive approach to geological assessment early in any revised siting process.
50. Some respondents expressed the view that geological suitability was the single most important issue in considering a site for a GDF, and that a national screening exercise should be undertaken at the start of any revised siting process, to focus on potential areas of suitable geology before seeking volunteers.
51. A few respondents called for nationally designated or environmentally sensitive areas to be ruled out as potentially suitable areas from the outset. Responses made on these issues under question 4 are reflected within the question 8 summary.
52. A few respondents proposed using previous Nirex data as the basis for conducting a search, and / or investigating the suitability of Government-owned land first.
53. Of those disagreeing with the proposed approach, many argued that Cumbria in particular should be excluded from any future siting initiatives as they felt the local geology had already been shown to be unsuitable. A few of those who disagreed with the proposed approach challenged the statement in the consultation that there is “no best or most suitable geology.” A few were also concerned that engineering might be used to attempt to overcome ‘poor’ geology, as they considered that reliance on engineering over the timescales needed was untested and likely to fail.
54. Whilst a number of respondents were supportive of Government’s proposal to provide early reports on regional geology, a few stated that these reports should be interpreted with regard to potential suitability for a GDF. A few respondents advocated an independent peer review of geological data, as an essential part of gaining the trust of potential host communities.

Government response

55. We recognise the desire for a more prominent, early consideration of geology in the site selection process. Whilst there is not one single ‘best’ type of geology for a disposal facility, and geology itself is not the only safety consideration, we are of the view that there is a need to address this issue openly and transparently and attempt to do more to provide information about geological prospects and engage on the role of geology in providing demonstrable long-term safety.
56. The statement in the consultation that there is “no best or most suitable geology” was disputed by a number of respondents to the consultation, so we wish to be clear about how that view has been reached. The Environment Agency has published an extensive report⁶ on technical issues associated with deep repositories in different geological

⁶ <http://bit.ly/1mAhQac>

environments, which lists nine different generic types of geological environment in which facilities could be located safely. Internationally, there are facilities being developed for a variety of waste types in clay-based rocks, in salt rocks, in hard fractured crystalline rocks, and even in tight limestone rocks. Different types of waste and different engineered wasteforms place different requirements on the long-term role of geology in the facility safety case. Some will benefit from greater chemical containment, some will require physical containment of waste and some will rely more heavily on simple protection of the engineered packages and barriers.

57. It is clear from responses to the consultation that there is a significant level of misconception about the role of geology and engineering in identifying a site for a GDF. The fear that engineering might somehow be used to overcome 'unsafe' geology is, in our view, misplaced. This is not the role of engineered barriers. All GDFs are a combination of engineering and geology. The different engineering options are designed to work with different geological settings, which in turn provide protection for the engineering (packages, backfill, facility structure) and the waste within. The final multi-barrier system for a given site will involve designing the engineered barriers to be consistent with the geological setting in a way which ensures the isolation and containment of the particular waste types. For example, the Swedish disposal concept for spent nuclear fuel relies on the hard, fractured bedrock to protect the clay backfill and copper canisters to allow them to contain the solid spent fuel waste for the necessary period. In contrast, the French disposal concept relies on the very low permeability clay to inhibit the movement of radionuclides away from the disposal tunnels with less reliance placed upon the engineered barriers in the long term. Both concepts achieve the same objective of long-term containment in different environments.
58. Given the consistent calls for more information on this issue, we consider that undertaking an open process that exposes the nature of these questions, and reaches transparent conclusions, will be helpful in engaging the public with greater confidence and understanding. Whilst there will be limitations on what can be determined with certainty at the outset of a siting process, given the limitations in available data and the interdependency of various geological factors that must be tested at a given site, there are still benefits in asking experts to assess the possibilities and to engage the public on this matter.
59. Under the approach set out in the new White Paper, a national geological screening exercise will be undertaken to develop and apply an early assessment of geological potential that will address the limitations of information available at this early stage. This will first involve the development of high level geological screening guidance, including public engagement on what could and should be included. This guidance will then be applied to produce assessments of initial prospects for developing a safety case in different settings across the country. Both the high level guidance and the final conclusions of the work will be opened up to review by an independent panel. The UK Government has asked the Geological Society of London⁷ to be responsible for overseeing the establishment of this independent review panel. The Geological Society of London is the UK national society for geoscience, and provides a wide range of professional and scientific support to over 10,000 Fellows, about 2,000 of whom live overseas.
60. A few respondents suggested using historic Nirex data as the basis of conducting a search for a site for a GDF. However, we note that the various investigations conducted by Nirex in the 1980s and 1990s only provided data that was focussed on a small

⁷ <http://bit.ly/1oW3tLh>

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number of sites (such as Sellafield, Dounreay, Killingholme, and Bradwell) and would not be suitable as the basis for a national exercise. Nirex did not generate new geological data on a national basis and did not undertake comparative consideration of existing data across the whole country. Details of the old Nirex process, which began by considering a set of 537 pre-determined potential sites, is publicly available⁸.

61. Investigating the suitability of Government-owned land first would be a top-down strategy, reflecting more closely the old Nirex process. We consider this to be inconsistent with the aims of working in partnership with willing communities. That being said, Government-owned land could be considered within areas that engaged in the new siting process.
62. The assertion made by a number of respondents that the geology of Cumbria has already been 'proven' to be unsuitable does not stand up to scrutiny. The Nirex proposals at Longlands Farm, and associated public enquiry, only related to a proposal for underground investigations in relation to possible disposal of one category of waste (intermediate level waste) in a relatively small volume of rock at Longlands Farm. A number of organisations, including CoRWM and the Geological Society of London have subsequently stated, when asked by the West Cumbria MRWS Partnership⁹, that they do not consider that sufficient data is available to confirm whether or not there are suitable sites in west Cumbria for disposal of UK radioactive waste. There is no robust basis on which to treat Cumbria differently from other areas in this respect.
63. We agree that the availability of independent third party views, on geology and other technical issues, throughout the process is an essential part of gaining the trust of potential host communities. We will implement a mechanism by which communities, the developer, and Government itself, can openly access independent, third party views on sensitive, complex or contentious issues during the GDF siting process. This is discussed in more detail in the Government response under Question 3 and in the new White Paper.
64. The consultation originally proposed that UK Government would publish basic information on regional geology, in advance of any 'call' for volunteers. The White Paper now sets out a process that involves the developer carrying out an initial consideration of geology at a national level in relation to the safety case for a GDF. In the meantime the British Geological Survey (BGS) have prepared plain English summaries of the basic regional geology of England, Wales and Northern Ireland, based upon existing, more technical Regional Guides. These summaries will now be published by the BGS as part of their wider work on better communicating the geology of the UK. The summaries are expected to be more generally useful in helping inform the public in a number of areas including shale gas and carbon capture as well as radioactive waste disposal.

Question 5: Do you agree with this proposed approach to planning for a GDF? If not, what alternative approach would you propose and why?

Summary of responses to question 5

65. About half of the respondents to this question agreed or partly agreed with the proposed approach to land use planning for a GDF in England. A minority disagreed with the proposals.

⁸ <http://bit.ly/1I2rYmD>

⁹ An advisory body set up to make recommendations to Allerdale Borough, Copeland Borough and Cumbria County Councils on whether they should participate in the Government's (previous) process for siting a GDF.

66. A few respondents stated that a GDF would clearly be nationally significant infrastructure – a large scale project vital to the long-term management of the UK’s higher activity radioactive waste – and that it was therefore appropriate of it to be brought within the nationally significant infrastructure planning regime in the Planning Act 2008.
67. Concerns were raised by a few respondents about county councils being excluded from having a participative role in the process. In some cases, this point was clearly in reference to the land-use planning proposals under discussion (with a number of respondents noting that county councils are responsible for waste planning in respect of their areas). In others, some misunderstanding was apparent about the difference between the local partnership process for deciding whether to pursue a facility and the land-use planning process decisions.
68. A few respondents felt that there would be a conflict of interest if the final decision on whether to grant development consent rested with the Secretary of State for Energy. They felt that the Secretary of State for Energy had a vested interest in delivering a GDF and this could impact on their impartiality in terms of reaching a final decision on development consent.
69. A few respondents voiced general support for the proposed approach to land use planning, provided that the proposed Appraisal of Sustainability of a National Policy Statement dealt with alternatives to the policy of geological disposal.
70. There was a general desire for the approach to land use planning to be consistent with a siting process that was based on voluntarism. In relation to this, a few respondents argued that a National Policy Statement should be made available early in the siting process, to provide clear information to potential host communities. A few respondents also argued that, while development consent for a GDF might be applied for under the nationally significant infrastructure planning regime, investigations that preceded development of a GDF should be dealt with through the local land-use planning system. Respondents suggested that this would be more democratic in the context of a voluntarist siting process, that local planning authorities would be in a position to make use of detailed local knowledge in coming to a decision, that they represented more directly the affected population, and that they had the necessary experience to determine such applications.

Government response

71. We agree with the view that a GDF is nationally significant infrastructure. We have set out in the new White Paper the intention to bring a GDF in England within the definition of a Nationally Significant Infrastructure Project, thereby applying the planning regime set out in the Planning Act 2008 to the development of such a project in England.
72. We have provided in the new White Paper that the surface-based borehole investigations necessary to characterise and assess potential sites for a GDF in England will also be brought within the definition of nationally significant infrastructure in their own right. This is because they are an integral part of the process for developing a GDF, and should be treated as such. It will ensure that this programme of work will be considered by the Planning Inspectorate, and be subject to the same arrangements for local consultation, as for the GDF itself.
73. A number of responses to the consultation suggested that this was being proposed in order to enable the Government to ‘force through’ a development consent application. We are of view that one of the advantages of bringing a GDF in England (and the borehole investigations that will precede the development of a GDF in England) within the nationally significant infrastructure planning regime is that these applications will be

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subject to specific requirements for local consultation and the consideration of local representations. We have taken on board feedback received through the consultation on the importance of building local support through a revised siting process. The nationally significant infrastructure planning regime includes clear provisions for the involvement of local authorities (both those in whose area a development is taking place and neighbouring authorities). We do not believe that, by adopting this approach, any councils are being 'excluded' from having a participative role in the land-use planning processes – they are being guaranteed one.

74. A few responses to the consultation stated that planning permission for non-intrusive geophysical investigations (as distinct from, and likely to precede, borehole investigations) should be sought through the local planning systems. The consultation left open the precise approach for these investigations (which may be carried out to inform early engagement with local communities). Having considered responses to the consultation, we agree that these should be sought through the local planning systems and have made provision for this in the new White Paper.
75. We disagree with the view that there would be a conflict of interest if the final decision on whether to grant development consent rested with the Secretary of State. This approach is in line with how development consent applications are decided in relation to other infrastructure projects, and the decision would be taken in the context of a clear decision making process, involving objective examination by, and advice from, the Planning Inspectorate. The Secretary of State's decision making role in the development consent process is quasi-judicial, and the process put in place within Government respects the differing roles between policy maker and quasi-judicial decision-maker. DECC has published guidance on propriety for dealing with development consent applications¹⁰.
76. A number of respondents were supportive of the proposed approach, provided that the proposed Appraisal of Sustainability of the generic National Policy Statement for England considered alternatives to the policy of geological disposal (that is, alternatives ways of managing the UK's higher activity radioactive waste in the long term). The new White Paper sets out the policy on, and the rationale for, geological disposal as the means by which higher activity radioactive waste will be managed in the long term. As outlined in the Government response to Question 8, we will, in line with the requirements of the Planning Act 2008, conduct an Appraisal of Sustainability of the proposed generic National Policy Statement for a GDF in England. The Appraisal of Sustainability will be designed to fulfil the requirements of the Strategic Environmental Assessment Directive¹¹, considering alternative means of implementing geological disposal (that is, alternatives to the proposed implementation of the policy through a National Policy Statement).
77. Feedback from the consultation stated the approach to land-use planning must be consistent with a siting process that involves working with communities, and that a National Policy Statement for England should be made available early. This has helped inform the process set out in the new White Paper. We intend to consult on the proposed National Policy Statement before the beginning of any formal discussions between communities and the developer. We are committed to making the National Policy Statement available as early as practicable, to ensure that communities have access to as much information as possible.

¹⁰ <http://bit.ly/1n9568Q>

¹¹ Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment

Question 6: Do you agree with this clarification of the inventory for geological disposal – and how this will be communicated with the volunteer host community? If not, what alternative approach would you propose and why?

Summary of responses to question 6

78. Opinions were mixed on the proposed approach to clarifying, and communicating, the inventory for geological disposal, with similar proportions of respondents to this question agreeing and disagreeing. Of those agreeing, many were of the view that any community considering volunteering to host a GDF would want clarity on what they would be accepting. Of those disagreeing, the majority were against the inclusion of wastes from the new build programme in the inventory (see below), with others either against geological disposal in principle, or wanting the concept of ‘community’ to be defined before any communication is undertaken.
79. Of those supporting clarification of the inventory, a few noted the need to raise awareness and present the inventory in an easily understood way so that communities could easily understand what they would be volunteering for. A few respondents also suggested presenting the inventory in terms of hazards, risks and impacts, citing the NDA’s Safety and Environmental Detriment Index (SED Index) as a tool for assessing risk and hazard (the SED Index was created to help prioritising facilities to be decommissioned).
80. A few respondents raised concerns about the inclusion of new build wastes in the baseline inventory, as they considered this to be contrary to CoRWM recommendation¹², and was only being done by Government to justify the proposed new build programme. Some of these respondents were also concerned that the spent fuel from the new build programme may be difficult to dispose of due to its proposed higher burn-up, which results in the spent fuel generating more heat, which can require longer interim storage prior to disposal.
81. A few respondents were concerned about proposals that wastes from overseas or devolved administrations could be disposed of in a GDF. Concerns related to the potential size and uncertainty of potential imports into the UK. Some were also of the opinion that if a GDF was built in England, it should be for English waste only and not take waste from elsewhere in the UK.
82. A few respondents were concerned about the disposal of waste and materials that could be reused or recycled, noting that while the UK base case for spent nuclear fuel arising from the UK’s new build programme is geological disposal, other countries (for example, France) still reprocess, and reprocessing may become more attractive if the price of uranium increases or mixed oxide (MOX) fuel becomes commercially viable. They questioned if, and how, materials could be retrieved from a GDF if they were subsequently identified as assets, or if a new method was invented to reduce the hazardous properties of the waste. A few also highlighted the importance of waste generators applying the waste hierarchy to minimise the amount of waste requiring disposal, and continued research and development into radioactive waste management.
83. A few respondents recommended the use of a maximum (or ‘worst case’) inventory instead of a baseline. They suggested that, due to the uncertainty of both the size of a new build programme and the potential reuse / recycling scenarios for spent fuel and

¹² *Managing our Radioactive Waste Safely, CoRWM’s 2006 recommendations to Government (CoRWM document 700)* <http://bit.ly/RE5dxh>

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nuclear materials, it would be helpful to assure communities that the inventory would not increase. Alternatively, some suggested use of a number of variant inventories, based on different scenarios, again to show how the scenarios could affect the overall GDF and its potential impacts. There were also suggestions that there would need to be an open and transparent process in place to manage any changes to the inventory. Others noted that the inventory is one of the key considerations in the safety case (the other being the geological factors) and a single inventory may limit where a GDF could be hosted, and so Government should consider splitting the inventory and aiming to build more than one GDF from the outset.

84. Relating this question to other proposals in the consultation document, a few respondents suggested that the inventory for inclusion in a GDF should be agreed with the host community, and linked to community benefits.

Government response

85. We agree that information on the inventory should be presented in as clear and easily understood a manner as possible. The new White Paper provides up-to-date information on the inventory, including greater clarity on the status of waste from new nuclear power stations in the inventory for disposal. Whilst we support the presentation of information on hazards, risks, and impacts as part of this our communication of the inventory, we consider this best left to the developer of the GDF to lead on. The developer, RWM, will manage the details of the inventory and will be producing the safety case and environmental impact assessments for the facility.
86. In response to the assertion that the inclusion of new build wastes in the inventory for disposal is contrary to CoRWM's recommendations, we note that, in 2006, CoRWM took no position on the desirability or otherwise of nuclear new build, but said that, in their view, a separate process to test and validate proposals for the management of the wastes arising from a new build programme should be brought forward in the event that a new build programme was introduced. Government subsequently consulted extensively on the issue of potential new build, including consideration of waste management, during 2007. This led to the 2008 White Paper *'Meeting the Energy Challenge'*, which set out policy on new nuclear build. Following this, Government also consulted extensively on the National Policy Statement for new nuclear power stations, including dedicated papers on the management of waste arising from potential new power stations. In a March 2010 statement, CoRWM acknowledged that *"new build wastes are being considered during the Managing Radioactive Waste Safely (MRWS) programme to implement geological disposal (Defra et al., 2008). As part of the voluntarism and partnership approach, potential host communities for a GDF for existing and committed wastes will be consulted about the inventory for disposal. The communities' discussions with Government about the inventory will cover new builds wastes, amongst other issues. Technical aspects of disposing of new build wastes in the same facility as existing and committed wastes will be explored by the NDA's Radioactive Waste Management Directorate (RWMD), as part of its work to implement geological disposal."* Government and the developer will continue to engage with communities about the inventory for disposal (including the now more clearly defined list of waste types) to ensure that a clear process for agreeing any significant changes to the inventory for disposal is developed.
87. In response to concerns about waste from overseas being disposed of in a UK GDF, UK Government reaffirms its general policy that radioactive waste should not be imported to or exported from the UK except in specifically defined and limited circumstances as defined in Command Paper 2919 Review of Radioactive Waste Management Policy, and the Transfrontier Shipment of Radioactive Waste and Spent Fuel Regulations 2008. The

2013 GDF siting process consultation document set out these circumstances, but they will be exceptions. Any waste that becomes part of the inventory for disposal will have to be managed appropriately, and disposal of all wastes in a GDF will require a robust demonstration by the developer that is safe, secure and environmentally acceptable, with any demonstration subject to scrutiny by the independent regulators. The inventory for disposal will not include wastes from sites in Scotland covered by the Scottish Higher Activity Waste Policy.

88. With regard to respondents proposing use of the waste hierarchy, Government and the independent nuclear regulators expect all users of radioactive materials to apply the waste hierarchy to the wastes they produce, and minimise the amount of waste and materials requiring disposal. The GDF will be a facility designed for final disposal. Whilst retrieval may be possible, we do not expect wastes to be retrieved for reuse or recycling once they have been placed.
89. We also support continued research and development into radioactive waste management, throughout the lifecycle of waste creation, storage and disposal. In 2013, Government published 'Nuclear Industrial Strategy – The UK's Nuclear Future'¹³, which includes the Government's response to the 2011 House of Lords report on the UK's nuclear R&D capabilities and the recommendations of the Ad-Hoc Nuclear Research and Development (R&D) Advisory Board. The Advisory Board was established to oversee work on an industrial vision statement, and R&D roadmap, a review of the R&D landscape, and a long-term nuclear energy strategy, all of which include radioactive waste management.
90. Having considered the proposal of a 'maximum' inventory to assure communities that the inventory will not increase, we have provided in the new White Paper a list of waste and material types that could comprise the inventory for disposal in any single GDF, to give communities considering hosting a GDF as complete a picture as possible of the wastes and materials that need to be considered. In particular, this list of waste and materials types includes a defined amount of spent fuel and intermediate level waste (ILW) from a new nuclear build programme to be covered by the GDF siting process (to that arising from currently published plans). The current stated industry ambition for new nuclear development is 16 gigawatt electrical. This is not a Government target and the UK Government is supportive of industry bringing forward plans for further development in future. In that event, the UK Government would need to discuss and agree the disposal of this additional spent fuel and ILW with any communities participating in the GDF siting process, with a view to either expanding any existing facility development or seeking alternative facilities.
91. As noted above, the developer will be responsible for managing the detail of the inventory for disposal on an ongoing basis, and presenting it in an easily understandable way. In connection with this, the developer may wish to present scenarios as to when different waste streams will be disposed of throughout the operational lifetime of a GDF.
92. We would prefer to seek to manage the inventory for disposal in a single GDF, if that GDF could be developed to provide safe containment for all the necessary waste, reducing costs and likely lowering environmental impacts. There is no technical reason why the development of one GDF to manage the inventory for disposal should not be possible – it largely depends on whether a large enough underground site can be identified in an area willing to host a GDF. Because of this uncertainty, the new White Paper does not rule out developing more than one GDF.

¹³ <http://bit.ly/1nNqwlC>

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93. We do not believe there are any compelling reasons why the amount of community investment funding should be related to the amount of waste (or its radioactive content) in the inventory for disposal. It will need to be demonstrated that the inventory can be disposed of in a manner that is safe, secure and environmentally acceptable, through transport, operation and after closure, regardless of its size.

Question 7: Do you endorse the proposed approach on community benefits associated with a GDF? If not, what alternative approach would you propose and why?

Summary of responses to question 7

94. The majority of respondents to this question disagreed with the proposed approach on community benefits as put forward in the consultation document.
95. Some respondents were concerned that the provision of community benefits constituted a bribe by Government. A few respondents were concerned that this could mean that economically deprived areas may see their future prosperity as being solely dependent on hosting a GDF. However, a few respondents felt that community benefits were an important reflection of the service that the host community would be undertaking for the nation and noted that community benefits are an accepted part of the planning process.
96. A few respondents argued that any community benefits fund should be independently administered and not put under the control of local authorities. A few respondents were concerned that local authorities would use such benefits to replace budgets that had been recently cut, rather than provide additional benefits to the community. Conversely, a few respondents felt that because the impacts of a GDF would be widely felt, any benefits should be distributed widely over all impacted areas, administered by the relevant local authority (or authorities). However, a few respondents felt that only the host community should receive the benefits as they would be most impacted.
97. Some respondents requested additional clarity on the proposals, including on the definition of 'host community'. Further detail was requested on the mechanism for disbursement of funds, what they were for and who would benefit as well as the actual types and scale of benefit available. It was noted that clarity was required to engender trust. A few respondents noted that the GDF is a long-term project and that therefore benefits should be designed to reflect its longevity and impact on future generations.
98. A few respondents supported early distribution of funds and enshrining the fund in legislation. The clarity around separate engagement funding was welcomed by a few respondents. A few respondents were concerned about the potential retrieval of benefits by the Government from a community fund, should a community withdraw from the process. Clarity was requested about how Government envisaged that this would work, especially on how communities would be impacted.
99. A few respondents stated that the host community should be identified before any benefits were discussed. This was linked to questions about the need for a community benefits package at all, if the GDF was safe and whether it would bring with it jobs and other related socio-economic benefits.
100. The issue of planning blight (potential effects on property prices) was raised by a few respondents. Linked to this, a few respondents were concerned about potential loss of business income from tourism and businesses leaving the area because of the siting of a GDF. Some suggestions were made that the community benefits fund should be used to address this.

101. A few respondents answered specifically relating to the previous process in Cumbria and its implications should there be any further consideration of siting a GDF in Cumbria. A few also raised concerns regarding their views of how the areas surrounding Sellafield had been affected over the years.

Government response

102. We take the view that community benefits are an important aspect of the GDF siting process, and agree with those respondents who felt that community benefits would be a reflection of the service that a community would be undertaking for the national good, and that community benefits are an accepted part of the planning process.
103. Community benefits are additional to the funding that Government will provide to meet the immediate and necessary costs of any community engaging in the siting process ('engagement funding'), and additional to any payments required of the developer as part of the planning process (to mitigate specific impacts of the development).
104. This reflects CoRWM's original recommendations to Government in 2006, which stated that *"Willingness to participate should be supported by the provision of community packages that are designed both to facilitate participation in the short term and to ensure that a radioactive waste facility is acceptable to the host community in the long term. Participation should be based on the expectation that the well-being of the community will be enhanced."*
105. Responses received to this question have helped inform the new approach to communicating this – first and foremost by taking on board the message that the provision of 'community benefits' may be misinterpreted by some as a 'bribe' by Government to accept a GDF.
106. We intend to be clearer in future that the funding is about 'community investment', which is a more accurate reflection of the purpose and intent of this funding. Community investment is aimed at maximising local benefit, supporting the development of local plans that help to improve the quality of life for local people. It is also about anchoring the inherent benefits of a GDF, estimated to be around £2bn (discounted) in terms of jobs, infrastructure, local regeneration and supply chains. It is our view that appropriate community representation will enable a community to determine exactly what community investment funding is spent on, enabling early, tangible, positive outcomes for their area, and with the aim of building confidence both in the siting process, and the positive objectives of Government and the developer.
107. We agree that providing greater clarity on the amount of community investment, and how this will be administered, will help to engender trust in the siting process. We have made provision for this in the new White Paper, setting out the difference between the inherent benefits of hosting a GDF, funding to mitigate the impacts of development, and the additional investment funding provided to help maximise the significant economic benefits that are inherent in hosting a nationally significant infrastructure project. To provide greater clarity on the overall scale of additional community investment, the new White Paper notes that it will be significant - comparable to international experience, and capable of generating intergenerational benefits to the community that hosts a GDF.
108. We note the differing views on how any community investment fund should be administered – in terms of the body (or bodies) responsible for doing so, and also the geographical spread of any investment funding. As with community representation, we recognise that this is a complex question of critical importance. Our view is that the answer needs to be developed in liaison with communities and independent experts. We have therefore decided to consider further the detailed question of community

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investment, and to be informed by recommendations from independent experts as it does so. We have set out in the new White Paper how this work will be taken forward and the specific issues that the community representation working group will look at in this regard.

109. That being said, we do agree with a number of detailed points of principle raised by respondents to the consultation, and have set these out as guiding principles in the new White Paper. The first is that community investment will be made available early on in the siting process – to support the development of communities that are engaging constructively with the process to find a permanent disposal solution for the UK’s higher activity radioactive waste. The new White Paper provides that early funding will be made available to communities engaging constructively in the siting process for a GDF, and have provided an indication of scale: up to one million pounds (£1m) per year per involved community in the early stages, increasing to two and a half millions pounds (£2.5m) should borehole investigations commence. The second point is that the new White Paper clarifies that early investment funding would be retained by the community should development of a GDF not proceed in the area in question.
110. In response to concerns expressed by a number of respondents on the potential negative impacts of a GDF development (such as impacts on tourism or house prices) raised by a number of respondents, it is our view that such impacts – if they were to arise – should be mitigated by the developer through planning obligations under section 106 of the Town and Country Planning Act 1990 (commonly known as s106 agreements). This is not the purpose of the additional community investment Government has committed to provide.

Question 8: Do you agree with the proposed approach to addressing potential socio-economic and environmental effects that might come from hosting a GDF? If not, what alternative approach would you propose and why?

Summary of responses to question 8

111. More respondents to this question agreed or partly agreed than disagreed with the proposed approach to addressing potential socio-economic and environmental effects that might come from hosting a GDF. However, most respondents were unclear on their level of support for this proposal, for reasons that included respondents not directly addressing the question or focusing on out-of-scope material (for example, opposition to geological disposal or to nuclear power).
112. A few respondents specifically supported the earlier provision of information in the siting process, arguing that this would allow earlier engagement on the key issues and help communities in their debates and deliberations. A few respondents stressed the importance of providing balanced, impartial, evidence based information to communities, clearly setting out both positive and negative impacts.
113. A few respondents expressed the view that nationally designated, or environmentally sensitive areas (for example, National Parks and Areas of Outstanding National Beauty) should be excluded from the siting process. Related to this, a few respondents expressed the view that socio-economic and environmental considerations should be assessed separately. This view derived from concerns that economic issues could take precedence over environmental issues.
114. A few respondents expressed the view that assessment information should be provided by an independent body (or bodies), and not the Radioactive Waste Management

Directorate of the Nuclear Decommissioning Authority, in order to ensure impartiality and engender trust in the information. A few respondents suggested that the assessments should be independently reviewed in order to build trust.

Government response

115. We agree that providing information about potential socio-economic and environmental impacts earlier would help support communities engaging in the siting process, and this has informed our approach to land-use planning (described under the Government response to question 5, and in the new White Paper).
116. We also agree that it is important that the evidence provided to communities is balanced, and impartial. This is why the new White Paper makes provision for the establishment of a mechanism through which communities (as well as Government and the developer) can obtain independent, third party advice on complex, sensitive or contentious issues or pieces of information during the operation of the siting process.
117. We note that any assessments carried out by the developer, or by third party contractors, will be subject to scrutiny and review by the independent regulators, who will be statutory consultees for the planning and assessment processes. We consider that this should help engender trust in the information – but that these scrutiny arrangements should be communicated more effectively to the public. We have set out in the new White Paper, in a visual form, the various roles and responsibilities related to the implementation of geological disposal, to provide greater clarity. We consider this to be an important issue that the developer will need to bear in mind going forward.
118. In response to those respondents wishing to see the ruling out of protected areas, such as National Parks, from the siting process, our view is that these areas are designated on the basis of valued surface attributes that would not be affected by a development deep underground. Whilst there may be issues around potential surface facility impacts, we are of the view that these can be best addressed through local decisions on the basis of specific information as it emerges, rather than through a top-down blanket exclusion from the outset. We note that there is no existing presumption against development in National Parks generally. Any development with environmental impact on a sensitive site would have to be evaluated through the many environmental impact and planning processes.

Question 9: Do you have any other comments?

Summary of responses to question 9

119. Within specific responses to this question (and in the material submitted to DECC which did not seek to answer the consultation questions, and was therefore treated as 'other comments' in this context), there was a wide range of opinions expressed and evidence cited.
120. A large proportion of respondents focused on local issues out of scope of a consultation on a national process (particularly relating to Cumbria), with similar number of respondents making the specific point that any revised national siting process should exclude Cumbria.
121. A number of respondents took the opportunity to highlight issues relating to other consultation questions – for example, calling for geological screening to identify sites, the need for clear communication, advocating a decision making role for county councils in two tier areas in England, the importance of local consultation and that environmentally

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sensitive areas should be excluded from any siting process. Where raised in a response to question 9, these issues have been captured within the summaries of the relevant questions.

122. A number of respondents discussed other issues out of the scope of the consultation, such as their opposition to the Government's policy of geological disposal and / or to new nuclear build.

Government response

123. Responses to substantive points raised in responses to Question 9 have either been addressed in Government responses under the previous questions, or were considered out of scope of this consultation.

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